

AUGUST 21, 2018

NACSA AUTHORIZER EVALUATION REPORT

SOUTH CAROLINA PUBLIC CHARTER SCHOOL DISTRICT

Authorizer

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ABOUT THE EVALUATION

PURPOSE AND PROCESS

This evaluation is designed to provide the authorizer with a reflective, formative analysis of its primary strengths, priorities for improvement, and recommendations for moving forward. Through this evaluation, NACSA hopes to provide the authorizer with critical feedback that will accelerate the adoption of practices that will lead to stronger outcomes for students and communities.

This evaluation is based on NACSA's *Principles & Standards for Quality Charter School Authorizing (Principles & Standards or P&S)*, which is recognized as the leading framework for authorizing best practices, having been written explicitly and implicitly into numerous state charter school laws. Consistent with NACSA's *Principles & Standards*, this evaluation assesses the authorizer's core responsibilities in the following areas:

1. Organizational Capacity and Commitment;
2. Applications and School Openings;
3. Monitoring and Intervention; and
4. Renewal, Expansion, and Closure.

This evaluation is also guided by key findings from NACSA's *Quality Practice Project (QPP)*, an initiative that seeks to build a stronger evidence base between authorizing practices and student outcomes. Through this research, NACSA studied the practices of authorizers with a range of performance profiles and identified certain practices and perspectives that correlate with strong student and public-interest outcomes. The key findings from this initiative, which are incorporated into this evaluation, include:

- **Commitment.** Great authorizers reflect their institution's commitment to quality authorizing. Authorizing is visible, championed, and adequately resourced, rather than buried in a bureaucracy. The people responsible for day-to-day authorizing functions have influence over decision-making.
- **Leadership.** Great authorizers are dedicated to a mission of giving more children access to better schools through the proactive creation and replication of high-quality charter schools and the closure of academically low-performing charter schools.
- **Judgment.** Great authorizers make decisions based on what will drive student outcomes, not based on checking boxes or on personal beliefs.

This evaluation is the culmination of a process, which included an extensive document review, data analysis, surveys, multiple conversations and discussions with the authorizing staff, and a two-day site visit, during which the evaluation team interviewed authorizing staff, leadership, board members, and charter school leaders.

ABOUT NACSA

NACSA believes that authorizers are responsible for ensuring that charter schools are good schools for children and the public. As an independent voice for quality charter school authorizing, NACSA uses data and evidence to encourage smart charter school growth. NACSA works with authorizers and partners to create the gold standard for authorizing and build authorizers' capacity to make informed decisions. NACSA also provides research and information that help policymakers and advocates move past the rhetoric to make evidence-based policy decisions. More at www.qualitycharters.org.

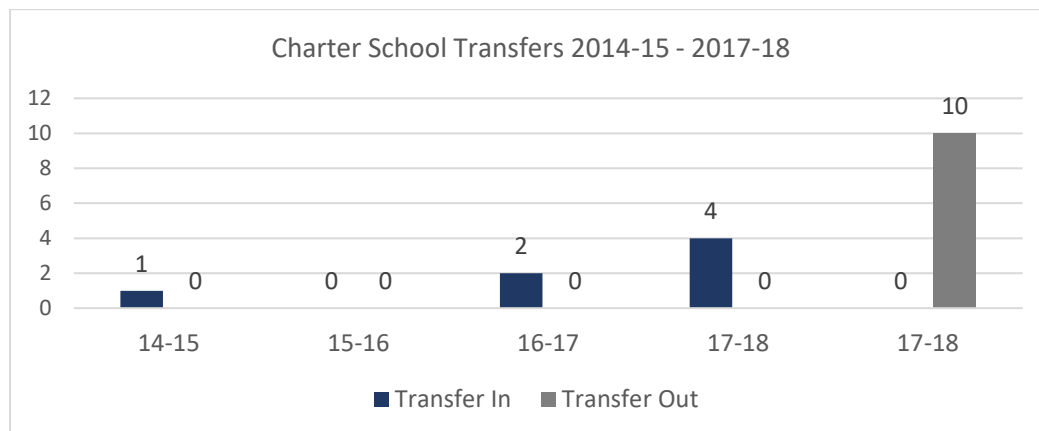
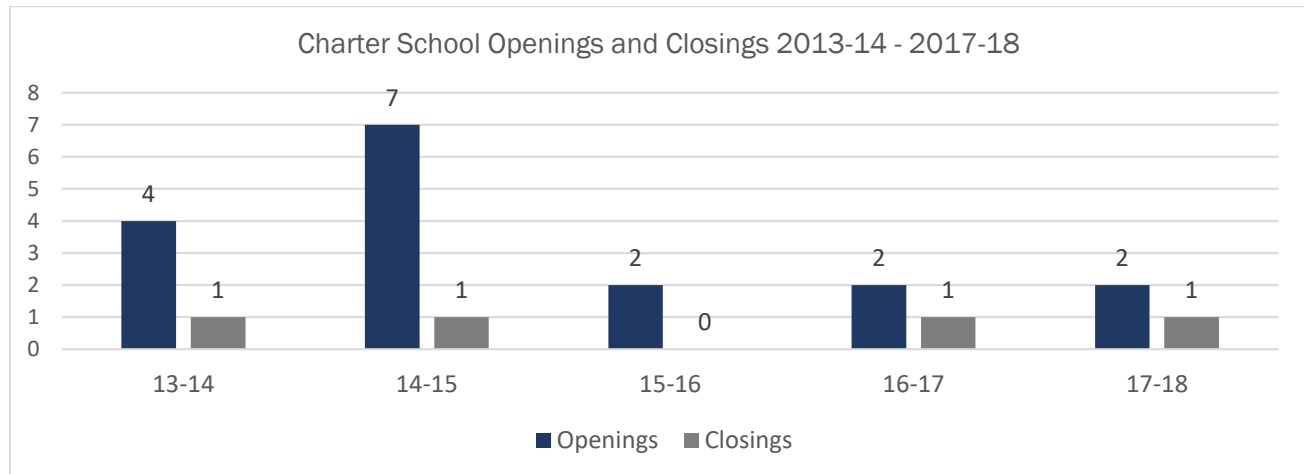
ABOUT SOUTH CAROLINA PUBLIC CHARTER SCHOOL DISTRICT (SCPCSD)

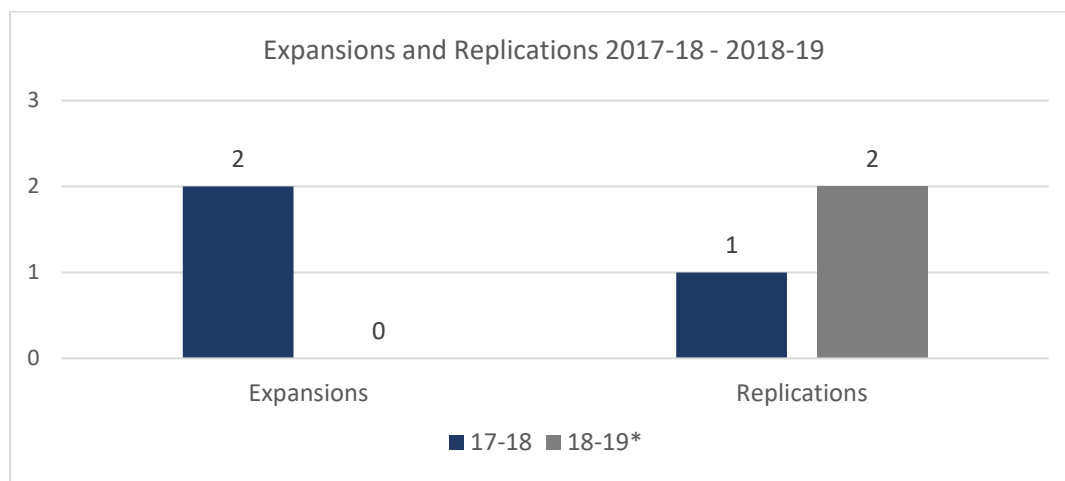
CHARTER SCHOOL MEMBERSHIP, MARKET SHARE, AND COMPOSITION

2017 Portfolio Membership and Market Share Information					
Membership	Portfolio	Charter Sector	Statewide	% Sector Market Share	% State Market Share
Number of Schools	39	72	1241	54.2	3.1
Enrollment	25,873	35,497	778,488	72.9	3.3
2017 Portfolio Composition					
Subgroup Percentages	Portfolio	Charter Sector	Statewide	% of Portfolio Schools that Surpass Their Residing District in Service to Subgroups	
POC%	37.9	39.1	49.3	23.1	
FRL%	42.3	41.0	58.6	29.7	
SPED%	11.5	-	13.6	32.4	
LEP%	3.9	3.4	6.2	15.4	

Notes: (1) FRL and SPED information is based upon 2016-17 data; statewide comparison information for 2017-18 is not yet available; (2) English learner information available statewide is contained to students categorized as LEP; (3) SPED figures only include students with reported ages of 6-21; and (4) virtual schools were compared to statewide averages.

CHARTER SCHOOL OPENINGS, CLOSINGS, TRANSFERS, AND GROWTH OVER TIME





*The district has approved two replications, which will open in the 2019 school year.

CHARTER SCHOOL PERFORMANCE

Elementary and Middle School

The table below shows the results of the South Carolina College-and Career-Ready Assessments (SC READY). These are statewide assessments in English language arts (ELA) and mathematics. All students in grades 3–8 are required to take the SC READY.

High School

End-of-Course Examination Program (EOCEP) provides tests in high school core courses and for courses taken in middle school for high school credit. English and Algebra are shown below. ACT results and graduation rates are also shown.

2016-17 Portfolio Performance Summary					
Subject	2016-17 Meets/Exceeds*	2016-17 Statewide Average*	Against the Standard	Over Time	Comparison
			% Schools that Surpass State Standard**	% Schools with an Upward Trend**	% Schools Outperforming Residing Districts**
Elementary School					
ELA	41.5	40.8	43.5	-	60.0
Math	42.4	46.9	47.8	-	65.0
Middle School					
ELA	44.7	39.2	64.0	-	62.5
Math	35.0	37.1	36.0	-	50.0
High School					
English Exams (Pass Rate)	82.2	77.0	86.4	-	78.3
Algebra Exams (Pass Rate)	67.3	75.1	47.8	-	34.8
ACT (Composite)	18.2	17.8	65.2	66.7	57.1
Grad Rate (On-Time, 4-Yr.)	60.0	84.6	60.0	85.7	68.4

Note: Due to changes in state assessments, trend analyses will not be possible for reporting until the 2018-19 school year.

*Student-level data

**SchoolLevel data

KEY FACTS ON AUTHORIZING AND POLICY CONTEXT

- SCPCSD, a statewide authorizer, authorized its first charter schools in 2007.
- SCPCSD currently authorizes 39 of the approximately 72 charter schools in South Carolina. SCPCSD expects to open seven new charter schools in Fall 2018 and has approved an additional three schools to open in Fall 2019.
- SCPCSD has a staff of approximately 21 team members and is governed by a nine-member board of trustees (though one seat remains vacant pending approval of the South Carolina Senate's Educational Oversight Committee). The current superintendent, Elliot Smalley, began his tenure in early 2016. More than 75 percent of the district's staff is new since 2016.
- The authorizer receives 2 percent of state funds allocated to its charter schools, with a FY2018 budget of approximately \$3.1 million. SCPCSD currently maintains approximately \$6 million in reserve.
- In South Carolina, local school districts, public or independent institutions of higher education registered with the South Carolina Department of Education (SCDOE), and SCPCSD can serve as charter school authorizers. Until FY2018, SCPCSD was the only statewide authorizer. During the past year, the Charter Institute at Erskine College has emerged as a new statewide authorizer and, as of July 1, 2018, 10 SCPCSD-authorized charter schools transferred to Erskine.
- The South Carolina legislature enacted a proviso to allow the SCPCSD Board to extend the review timeline for charter applicants meeting certain criteria related to addressing achievement gaps in underserved areas of the state. This change impacted the authorizer's new school application process in 2017 and 2018.

LANDSCAPE ASSESSMENT

Over the past two and half years, SCPCSD leadership has established a strong and uncompromising commitment to the principles of high-quality authorizing. This commitment includes a focus on respecting school autonomy in exchange for accountability for student outcomes and represents a significant departure from past practice when SCPCSD behaved more like a traditional school district than a charter school authorizer.

This evaluation marks SCPCSD's third NACSA authorizer evaluation – the first two were completed in 2010 and 2013. NACSA applauds SCPCSD's commitment to self-reflection and the tremendous changes it has implemented since 2013. The 2010 evaluation report highlighted SCPCSD's overall lack of quality authorizing practices and its primary focus on functioning like a traditional school district rather than as a charter school authorizer. When NACSA returned in 2013, it still did not consider the district more than “partially developed” in any area, stating specifically that “authorizing staff also frequently have LEA-style responsibilities that, necessary as they are, take time from the planning and implementation of authorizer duties” and “while directionally sound, the SCPCSD strategic plan, revised in March 2013, lacks a compelling theory of action, particularly with respect to accountability.”

Since 2013, SCPCSD has embraced the key components of quality authorizing and has made significant improvements in its practices. SCPCSD now implements a comprehensive new school application and pre-opening process; a clear performance framework and intervention protocol; annual, public reports of school performance; a replication process for high-performers; and clear protocols for renewal, revocation, and closure. In the last two years, the district has closed four schools based on low performance – more than the number of schools closed by the district in its first six years of existence. Furthermore, during the past year, the district has exhibited courage in holding the line on school quality by denying a significant number of new school applications that did not meet criteria and by holding currently operating schools accountable for low student performance. SCPCSD has done so in the face of significant pressure to lower its standards due to the emergence of a new statewide authorizer designed to function more like a traditional school district.

SCPCSD's work to improve its authorizing practices, increase accountability in its sector, and focus on equity and outcomes is beginning to pay off for students and families. The district has seen marked improvement in achievement over the last two years. Last year, SCPCSD had a 10-point increase in its graduation rate, moving to 60 percent for the first time in history (this average was in the 30s during the previous NACSA evaluations). In the last two years, there has been a double-digit gain in the percentage of SCPCSD graduates attending two- and four-year colleges. And compared to two years ago, more than 70 percent of SCPCSD schools now have higher growth rates.

In addition, SCPCSD has demonstrated its willingness to take calculated but creative risks to attract and promote high-quality charter school operators, both within and external to its current portfolio of schools. NACSA applauds SCPCSD for its commitment to providing high-quality options to students and families in South Carolina and its willingness to consider and try out-of-the-box solutions to address some of authorizing's most challenging issues.

From this new strong baseline, SCPCSD has the opportunity to further refine its authorizing practice to create more high-quality educational opportunities for South Carolina families and to accelerate the performance of its current portfolio. SCPCSD should continue to build the capacity of its authorizing staff, strengthen its application review and monitoring processes to optimize the quality of both new and currently operating schools, and apply its core commitment to quality to the renewal process that many schools will undergo in the coming years.

STRENGTHS AND SPOTLIGHTS

Organizational Capacity and Commitment

A quality authorizer engages in chartering as a means to foster excellent schools that meet identified needs, clearly prioritizes a commitment to excellence in education and in authorizing practices, and creates organizational structures and commits the human and financial resources necessary to conduct its authorizing duties effectively and efficiently.

Reference: NACSA's [Principles & Standards for Quality Charter School Authorizing](#), Standard 1: Agency Commitment and Capacity; and [Leadership, Commitment, Judgment: Elements of Successful Charter School Authorizing: Findings from the Quality Practice Project](#), pgs. 10 – 15.

- SCPCSD leadership has established a strong and uncompromising commitment to the principles of high-quality authorizing. The staff team shares this commitment, which guides core district activities and decision-making geared toward the establishment of great schools that achieve positive student outcomes.
- SCPCSD has developed a clear process for project management at the leadership level to ensure that organizational priorities (the nine priority projects for SCPCSD for the year) are established, monitored, and achieved.
- SCPCSD is willing to take calculated but creative risks to attract and promote high-quality charter school operators, both within and external to its current portfolio of schools. Examples include an authorizer-fee-reduction incentive for high performers (see Practice Spotlight below), a new school fellowship program, and targeted/streamlined replication of strong schools.



PRACTICE SPOTLIGHT – Authorizer-fee-reduction incentive for high-performing schools

SCPCSD recently established a tangible, meaningful incentive for its high-achieving and high-growth charter schools: reducing the 2 percent authorizer fee to 1 percent. Through its School Performance Framework, the authorizer establishes high standards for performance. Charter schools that demonstrate high growth and/or high achievement are recognized and rewarded with 1 percent withheld instead of the standard 2 percent authorizing fee. The reduction occurs as part of each monthly payment to schools and is subject to schools continuing to maintain a status of Good Standing during the year. The SCPCSD has the right to revoke the 1 percent fee reduction if a school falls out of Good Standing. SCPCSD developed this policy to underscore the importance it places on strong student outcomes and to reward high-performing schools with additional autonomy and resources to re-invest in their students at the school level.

Applications and School Opening

A quality authorizer implements a comprehensive application process that includes clear application questions and guidance; follows fair, transparent procedures and rigorous criteria; includes an interview of all qualified applicants; and grants charters only to applications that demonstrate strong capacity to establish and operate a quality school.

A quality authorizer uses the pre-opening process to build relationships, set expectations, and provide technical assistance to schools, and does not let schools open that have not demonstrated their readiness to serve students.

Reference: NACSA's [Principles & Standards for Quality Charter School Authorizing](#), Standard 2: Application Process & Decision Making; and [Leadership, Commitment, Judgment: Elements of Successful Charter School Authorizing: Findings from the Quality Practice Project](#), pgs. 16 – 20.

- SCPCSD now implements all the core components of a comprehensive application process: clear application questions and guidance; fair, transparent procedures; rigorous criteria and review process using external expertise; and an interview of all qualified applicants. This is in contrast to practice prior to 2016.

- SCPCSD executes a pre-opening process that builds relationships with new schools, sets expectations, and provides appropriate technical assistance to schools.

School Monitoring and Intervention

A quality authorizer defines and incorporates into the charter contract, clear, measurable, and attainable academic, financial, and organizational performance standards and targets that the school must meet as a condition of renewal.

A quality authorizer conducts contract oversight that competently evaluates performance and monitors compliance; ensures schools' legally entitled autonomy; protects student rights; informs intervention, revocation, and renewal decisions; and provides annual public reports on school performance.

Reference: NACSA's [Principles & Standards for Quality Charter School Authorizing](#), Standard 3: Performance Contracting and Standard 4: Ongoing Oversight and Evaluation; and [Leadership, Commitment, Judgment: Elements of Successful Charter School Authorizing: Findings from the Quality Practice Project](#), pgs. 13 – 15.

- SCPCSD has a centralized review system whereby all official notices sent to schools are reviewed by the New Schools and Accountability team. This practice allows tracking of correspondence throughout the organization and ensures a level of consistency in communication regardless of which department is issuing the notice.
- SCPCSD makes a variety of information accessible to the public via its website, including but not limited to copies of the School Performance Framework used in the past several years, school academic performance data, and links to state assessment data.



PRACTICE SPOTLIGHT – Promoting replication of high-performing charter schools

The authorizer created the state's first-ever replication application designed to facilitate the growth of high-performing schools. The replication process focuses on providing evidence of the initial site's success, as well as its capacity to grow while maintaining strong outcomes for students. SCPCSD also reserves the right to conduct additional due diligence using the information available to it as an authorizer. The creation of the replication application resulted in the authorizer's highest-performing school growing from one campus to two during the 2017-18 school year, with two new replication schools approved for 2019-20. The SCPCSD is currently working on the next iteration of its replication application, slated to launch within the coming year. Creating such a process serves as a clear signal that the district is actively working to support and encourage quality growth in order to allow more students access to high-performing schools.

Renewal, Expansion, and Closure

A quality authorizer designs and implements a transparent and rigorous process that uses comprehensive academic, financial, and operational performance data to make merit-based renewal decisions and revokes charters when necessary to protect student and public interests.

A quality authorizer encourages high-performing charter schools to expand through a transparent process based on clear eligibility standards and historical performance records.

Reference: NACSA's [Principles & Standards for Quality Charter School Authorizing](#), Standard 5: Revocation and Renewal Decision Making; and [Leadership, Commitment, Judgment: Elements of Successful Charter School Authorizing: Findings from the Quality Practice Project](#), pgs. 16 – 17.

- The authorizer has defined criteria for high-performing schools to qualify for 'fast track' expansion and has drafted an application process for these expansions that will be available for use in the fall of 2018.
- The authorizer holds its ground on issues of school quality even under the most difficult of circumstances, working to prevent authorizer shopping by bolstering current law with its own

policies. The authorizer has closed four schools in the last two years based on performance – more than in the previous six years of the district’s existence.

RECOMMENDATIONS | ORGANIZATIONAL CAPACITY AND COMMITMENT

A quality authorizer engages in chartering as a means to foster excellent schools that meet identified needs, clearly prioritizes a commitment to excellence in education and in authorizing practices, and creates organizational structures and commits human and financial resources necessary to conduct its authorizing duties effectively and efficiently.

Recommendation 1.1: Review allocation of internal capacity and staffing to ensure that the district performs all core authorizing functions at the highest levels, in alignment with its clear strategic direction and commitment.

Members of the SCPCSD board, leadership, and staff clearly articulated that, to the extent possible, they seek to operate as a high-quality charter school authorizer rather than as a traditional public school district. NACSA's 2013 evaluation report specifically called out the district's need "to create a quality authorizing team devoted to application, monitoring, and renewal functions" and to ensure that all staff receive training on "principles and standards of effective charter school authorizing." The district internalized this feedback and over the past two and a half years, under the leadership of the current SCPCSD superintendent, has shifted its orientation toward charter school authorizing. Since 2013, SCPCSD has put into place systems and structures to support all of the core functions of a high-quality charter school authorizer across the life cycle of a school. The district has also hired personnel with strong authorizing expertise to execute these functions. For the most part, school leaders interviewed acknowledge and appreciate the district's new focus on autonomy in exchange for accountability for student performance.

However, the district should consider additional reprioritization to strengthen its internal capacity to perform its authorizing responsibilities at the highest levels. South Carolina charter law allows SCPCSD to retain 2 percent of total state appropriations for each charter school it authorizes to cover the costs of authorization, and the district has exercised strong fiscal discipline to operate efficiently. However, core authorizing staff expressed that they work very long hours to maintain the standard of quality that they expect to deliver for schools. High staff turnover – even though much of this has been purposeful to strategically bring on specific authorizing expertise – has exacerbated the workload demands placed on core authorizing staff. Given that the district's strategic plans include continued emphasis on attracting new operators and holding its current portfolio accountable for performance, the district should ensure that core authorizing functions, especially new application and expansion reviews

and ongoing performance monitoring and intervention, are fully supported with sufficient internal capacity.

Recommendation 1.2: Develop a strategic plan for leveraging the district's cash reserves to advance key priorities.

Through careful resource management, SCPCSD has been able to accumulate a large cash reserve of nearly \$6 million (largely from the 2 percent authorizer fee collected from schools) over its first decade of operation, which represents almost two years worth of operating capital. The district continues to generate annual surpluses, notwithstanding an expected lean year in FY2019 due to the transfer of 10 schools to Erskine (partially offset by the expected opening of seven new schools). This strong annual fiscal position allows the district to consider how to leverage its reserves for investment in strategic objectives without sacrificing ongoing operational capacity. The district has already demonstrated the willingness to tap its reserves to make strategic investments through efforts such as the New Schools South Carolina Fellowship program and the recently approved leadership development program. However, given the size of the reserve, the district should develop a plan to strategically leverage the cash reserve to advance key priorities and determine a target fund balance.

There are many ways SCPCSD could leverage the reserve to support its current portfolio of schools. The district should consider a range of options, including spending down the reserve to a lower level in strategic one-time investments (e.g., a research study on the efficacy of the district's portfolio) or other ways to tap the reserve for temporary withdrawals that are subsequently returned. One example of the latter, given in the spirit of the creative risk that SCPCSD has already shown it is willing to take, would be establishing a revolving loan fund with targeted purposes that meet the unique needs of charter schools in the district's portfolio depending on the stage of development and growth. For newly authorized schools, the district could support strong school launches in the pre-opening period by providing cash-flow bridge loans. This could be particularly helpful given the frustrations expressed by leaders of start-up schools about the difficulties with the timing of the release of federal Charter Schools Program planning and implementation funds administered by the SCDOE. The district could similarly support the development efforts of schools approved to replicate or expand in the planning period prior to the flow

of additional operational per-pupil funds. In both of these examples, the district can protect against blurring autonomy/accountability lines by providing access to loan funds only after it has authorized a new charter or

expansion/replication request.

RECOMMENDATIONS | APPLICATIONS AND SCHOOL OPENING

A quality authorizer implements a comprehensive application process that includes clear application questions and guidance; follows fair, transparent procedures and rigorous criteria; includes an interview of all qualified applicants; and grants charters only to applications that demonstrate strong capacity to establish and operate a quality school.

A quality authorizer uses the pre-opening process to build relationships, set expectations, and provide technical assistance to schools, and does not let schools open that have not demonstrated their readiness to serve students.

Recommendation 2.1: Ensure that substantive authority for new school recommendations rests with district leadership, not external reviewers; assign the lead evaluator role to a SCPCSD staff member.

SCPCSD currently implements a rigorous application review process, which includes many key improvements since NACSA's 2013 evaluation, including the use of standard evaluation criteria, the conduct of a formal capacity interview of the founding group and the use of external expert reviewers, in alignment with NACSA's *Principles & Standards*. External expert feedback is a critical component of any strong new school review process. However, in practice, the district cedes at least partial discretion over the application review process by selecting an external evaluator to serve as the lead reviewer. The lead evaluator has a great deal of influence in determining whether an application meets standards and whether to recommend an application for approval. The district also could more fully leverage its internal expertise in its review process. For example, finance staff do not currently participate in the review of applications, even though they conduct fiscal monitoring for existing schools. Further incorporation of expert staff review can strengthen the evaluative process.

The deference to the external lead reviewer also creates the potential for inconsistent application reviews and limits the district's ability to leverage its own professional judgment, staff expertise, and local contextual knowledge in developing evidence-based recommendations for arguably the most important decision that an authorizer must make: whether to grant a new charter.

This practice shift is particularly important as the district seeks to better align staff recommendations with board decisions. The district's internal expertise is as important as external expertise in coming to an evidence-based recommendation, particularly given factors that may be unique to South Carolina. Building formal internal review and discussion into the process can also strengthen the deference that SCPCSD board members may give to staff recommendations as the staff team builds credibility in the process over time. It is also important because, unlike external reviewers, the district's staff (and, more importantly, students and families) will have to live with

the consequences of a decision to open a charter school that may not have the capacity to operate successfully.

The district might also consider its practice of bringing all decisions to the board for approval or denial. One possible shift is for the district to bring to the board (for vote) only applications that have been determined by professional staff review to have met criteria, and requesting that applicants who don't meet criteria withdraw their applications for future consideration. This will focus board discussion on meritorious applications. For an application that staff does not recommend because they have determined that it did not meet application criteria, but that the applicant insists on having brought to the board for a vote, SCPCSD could consider developing a review process with a more formal structure, including standards for evidence, which provides for sufficient time for the board to carefully consider the applicant's case. The current process of board questioning of selected individuals who present an application during a regular board meeting does not provide sufficient time or structure to allow for adequate consideration of the application's merits. The district should align this process with any reconsideration of an application under the new 60-day extension proviso instituted by the legislature to ensure that it does not compromise the standard of approval.

Recommendation 2.2: Establish a proactive support and review structure to maximize the potential for yielding the highest-quality charter applications while maintaining applicant autonomy and independence from the district.

The district has a clear goal to promote the growth of new, high-quality charter schools in its portfolio but also recognizes that there is currently a supply challenge in South Carolina. While the district can continue to establish operational conditions that may attract high-quality operators from other markets, there is also a need to scaffold support for the development of stronger local applications. The New Schools South Carolina Fellowship program is one way the district has attempted to develop the capacity of potential school leaders. However, the district may want to evaluate the return on investment of this program and the

additional challenges it creates by putting the district in the unusual position of being both coach and judge.

There are other strategies to consider for building applicant capacity without substituting the district's own capacity and compromising the district's authorizer independence. The district could conduct a structured series of public information sessions (not unlike the "boot camps" that the district established to support the new school opening process after charters are granted) on key topics (e.g., special education, finance, facilities) prior to the application due date, to clearly highlight areas that a strong application must address. The district could also leverage strong operators in its current portfolio to co-present on critical topics and to share lessons learned from firsthand experience. This structure can also serve to help groups self-assess whether they are actually ready to submit applications.

The district could also establish a multi-stage review process, with formal feedback provided at each stage, so applicants can better understand areas of concern and use feedback, if needed, to strengthen future submissions. This process can also include formal, in-person debriefing meetings with applicant groups to ensure that the key substantive issues are understood and to begin to build relational trust and credibility.

Each of these strategies require an investment of time and resources but, as noted above, SCPCSD is well-positioned to do so. In addition, given the current operator and support organization environment in South Carolina (including the lack of an independent new school incubator program), it is worth exploring the benefits and risks of these types of scaffolding structures to increase the supply of applicants that can meet the district's quality bar to open a new charter school.

RECOMMENDATIONS | SCHOOL MONITORING AND INTERVENTION

A quality authorizer defines and incorporates into the charter contract clear, measurable, and attainable academic, financial, and organizational performance standards and targets that the school must meet as a condition of renewal.

A quality authorizer conducts contract oversight that competently evaluates performance and monitors compliance; ensures schools' legally entitled autonomy; protects student rights; informs intervention, revocation, and renewal decisions; and provides annual public reports on school performance.

Recommendation 3.1: Ensure communications to school leaders and school boards are clear and comprehensive regarding the content and application of the Core Performance System and School Performance Framework.

NACSA commends the SCPCSD for the design and implementation of a thoughtful performance framework in a short period of time. When NACSA last evaluated the district in 2013, it did not have a comprehensive performance framework, which limited its ability to make high-stakes performance decisions in a transparent and consistent manner.

The SCPCSD now has a comprehensive performance framework that meets many of the criteria set forth in NACSA's *Principles & Standards* by defining clear, measurable, and attainable academic, financial, and organizational performance standards. SCPCSD's contract requires schools to abide by the district's performance framework but does not embed the performance framework's standards and targets in the contract itself, with the exception of 'charter goals,' which are appended to the contract as an attachment.

While incorporating the performance framework as a contract requirement only by reference allows the SCPCSD the flexibility to adjust the performance framework (which is a reasonable consideration given the 10-year charter term and the size of the district's portfolio), this approach makes it more difficult to ensure that schools are fully aware of expectations, especially given that the School Performance Framework has changed on an annual basis in recent years.

To this end, the SCPCSD has gone to great lengths to communicate changes regarding the annually released School Performance Framework, which is a part of the Core Performance System (CPS). Staff have made in-person and electronic presentations of the current iteration of the School Performance Framework, and also provided updates and release timelines in writing via Operator's Notes, mailers to school boards, and email directly to individual school leaders and board chairs. In

addition, staff have been available for questions via phone and email, and have even offered in-person walkthroughs of results and methods to all interested schools.

While SCPCSD has utilized a number of communication strategies and the SCPCSD's ongoing efforts to improve the School Performance Framework are laudable, in order to ensure that schools "know the outcomes for which authorizers will hold them accountable" (P&S, p. 23), it may be useful to incorporate information about the general philosophy SCPCSD will apply when common difficulties arise (i.e. changes to state tests, inability to access certain information, etc.). For example, including statements such as "the SCPCSD holds schools harmless for indicators when the state does not provide the relevant data" in the CPS may streamline communication efforts and provide schools with a better understanding of the CPS as the 'anchor' to which the School Performance Framework is tethered.

The SCPCSD may also wish to consider a long-term strategy that will maximize stability in the School Performance Framework, thus minimizing the need for intensive communication strategies and increasing transparency. This could be accomplished by moving to an ongoing review and improvement cycle over a longer period (i.e. updates every five years). The district is already moving in this direction by creating thoughtful processes such as the request for reconsideration process, which will become more familiar to schools each year, as well as a calculation tool (set for launch this school year) that will allow schools to check and better understand their School Performance Framework results. The district is also working to align 'charter goals,' which are at times outdated, with more relevant school-specific goals, which will be included in the School Performance Framework.

Recommendation 3.2: Improve communication around intervention notices and standing.

The SCPCSD CPS provides information on a number of key accountability processes, including

performance measures and targets, timelines for school receipt of annual School Performance Framework evaluations, and basic timelines for site visits.

The document also includes descriptions of the SCPCSD Intervention Ladder, which involves various levels of standing. Levels of standing range from Good Standing to Revocation Review and are designed to provide schools with clarity around the level of concern being expressed by the authorizer. However, in practice, slight variations in nomenclature (i.e. letter of intervention vs. letter of caution vs. notice of caution), coupled with the practice of issuing multiple letters/notices with the same level of significance and, at times, without reference to whether other notices have been resolved, has caused confusion for school leaders and boards. For example, CREECS received a Notice of School Performance issued on April 11, 2017, which indicated that three letters of caution and one notice of caution were issued to the school over the course of its existence and suggested that three of the four issues had been remedied. No information on the fourth notice was mentioned, leading to the possible conclusion that it was not remedied.

Consultation with SCPCSD staff indicated that while there has been some confusion around intervention nomenclature, schools wish to keep the current system. Providing a brief document defining key terms as part of or an attachment to all intervention letters could assist schools. Similarly, ensuring that the initial portion of every notice of intervention provides information on the prior standing would also facilitate clear communication to school's board members and leadership teams.

Recommendation 3.3: Develop a site visit strategy and a corresponding site visit protocol that includes guidance for the individuals conducting the site visit and standard procedures for communicating with schools to ensure they understand the purpose and focus of the visit, and receive timely feedback post-visit.

SCPCSD monitoring and intervention protocols have many strengths and clearly communicate the authorizer's desire to uphold high standards for school performance. However, while many monitoring protocols are in place, high levels of staff turnover have made it difficult for the SCPCSD to "intentionally develop relationships with school staff and leadership, typically through visits to the school and phone calls, outside of formal accountability

processes," a practice highlighted by the QPP (p. 11).

The authorizer is beginning to move toward more frequent monitoring, most notably in the area of school finance, in which quarterly financial monitoring has begun as a way to detect and communicate concerns before a crisis may become imminent. Another opportunity in this area is the use of site visits.

Site visits to schools in Good Standing are currently limited to twice during a typical contract period (10 years), aside from the renewal visit. In 2017, the district hired outside consultants to conduct these visits using a rubric with comprehensive statements, such as "teachers are implementing the curriculum with fidelity," that cannot realistically be assessed by a single evaluator during a partial day visit with limited stakeholder contact. The use of outside evaluators and an overly detailed rubric also increases the likelihood of inconsistent feedback and reports, and misalignment with staff findings that could undermine the authorizer's position. Staff noted that such misalignment had occurred in the past and resulted in at least one troubled school receiving a glowing site visit report that undercut the authorizer's message of urgency.

As noted in the QPP, strong authorizers "use formal site visits to collect information about schools and use the site visit process to facilitate difficult conversations with schools when needed. Information from site visits are used to provide a more robust assessment of school performance and often augment and amplify other quantitative performance information" (p. 22).

Prior to crafting a site visit protocol, SCPCSD must first determine its goals for the site visits (i.e. building relationships, triangulating information, collecting data, having a presence in the building, addressing performance issues). There may be multiple goals for the site visits and these goals may differ depending on the school, its age, its history of performance, or other factors. The district may find that it's helpful to group schools according to one or more of these factors. After the district identifies its goals for the site visit, it should then think about the structure and timing of these visits (i.e. bi-annual, annual, twice-per-contract, and how the timing, frequency, and length of said visits relate to school performance and the district's School Performance Framework).

The SCPCSD is currently engaged in intensive portfolio improvement efforts and may wish to consider the value of relationship building as a part of its desired purpose in visiting schools. Strong relationships build trust and provide the authorizer with leverage to use in generating buy-in, compliance, and the ability to discuss concerns in a collegial manner. Selecting internal SCPCSD staff to

conduct site visits may further relationship goals, while utilizing trained external staff may provide an additional level of objectivity. Similarly, the benefits of utilizing a team approach to evaluation must be weighed against the greater resources required to execute each visit.

Inclusion of school leaders, board chairs, or other board members as a part of the visit process can serve as a communication bridge and an opportunity to provide context and clarification on written documents the school has received from the authorizer. The SCPCSD may also wish to consider including the perspectives of other stakeholder groups, such as parents, students, school leadership team members, classroom teachers, and those in charge of programming for English learners/Special Education Students.

In developing a site visit protocol, it's also important to

ensure that each school receives clear and sufficient communication prior to, during, and after the visit, so that each school understands the purpose and the scope of the visit and how it connects to the authorizer's larger monitoring and accountability system. If there are specific issues the authorizer would like to discuss during the site visit or documents the authorizer would like to review, these should be stated and/or identified up front, so that the school has the opportunity to prepare. Creating a standardized preparation template that can be shared with school prior to the visit and a form report template to share findings from the visit will also help promote consistency and transparency. Findings from the site visit should directly align to the intended and stated scope of the visit and should align with the authorizer's performance monitoring and accountability system.

RECOMMENDATIONS | RENEWAL, EXPANSION, AND CLOSURE

A quality authorizer designs and implements a transparent and rigorous process that uses comprehensive academic, financial, and operational performance data to make merit-based renewal decisions and revokes charters when necessary to protect student and public interests. A quality authorizer encourages high-performing charter schools to expand while establishing clear eligibility standards for school past performance and a clear process for considering expansion and replication requests.

Recommendation 4.1: Leverage upcoming renewals as an opportunity to build early communication strategies and strengthen the portfolio.

Since NACSA's 2013 evaluation report, which called on the district to establish a "transparent, effective process for charter renewal decisions based on the performance framework," the district has developed and implemented new policies and procedures, and is well positioned to continue to build on these strong practices and use them as a vehicle for improved communication and a stronger-performing portfolio. The SCPCSD has several processes in place that dovetail with renewal. First, the Renewal Framework provides required renewal application criteria, information on the renewal process, and circumstances under which a school may not be renewed. Second, the authorizer has more recently adopted a Charter Review process that specifies the procedure to be used when additional information is needed to support a renewal, non-renewal, or revocation recommendation. With a number of schools up for renewal in the coming years, the SCPCSD has a significant opportunity to impact the quality of its portfolio by leveraging these processes to their fullest extent.

In particular, the SCPCSD may wish to consider standardizing the use of the Charter Review process for all schools at a defined point, such as 3 to 5 years prior to renewal. Such a process would provide a second 'high-stakes' review opportunity as recommended by NACSA (P&S, p. 14) and mitigate SCPCSD's own concerns about the length of 10-year contracts. Such a process could also open lines of communication, which, if maintained over the remainder of the contract, would support and promote clarity for schools at renewal.

Early communication strategies work to build productive relationships, increase the availability of qualitative information, improve public perception of authorizing work, provide opportunities to ensure that schools fully understand their likelihood of renewal, and combat "we didn't know/understand" arguments that schools recommended for non-renewal often use

to engender sympathy from an authorizer's decision-making body.

Recommendation 4.2: Build relationships and develop long-term communication strategies with schools' boards.

As noted previously, the SCPCSD has several processes in place around charter renewal. However, one area where growth is underway is the development of thoughtful, long-term communication strategies with school boards. NACSA recommends that authorizers inform the school and its board of underperformance years in advance of the end of the school's charter term. Such communication should include multiple feedback loops, including formal face-to-face meetings with the school leader and the school's board, to ensure the school is aware of performance that may lead to nonrenewal far in advance of the renewal decision.

Currently, the SCPCSD has some critical practices in place that can serve as a foundation for a more robust board engagement strategy. For example, the School Performance Framework information is transmitted to boards and school leaders annually and official notices are sent to board chairs, as well as school leaders. In addition, the SCPCSD has started a monthly "Great Governance" email and added a phone touch-point with school board members this past spring, adding a personal touch. The SCPCSD does not currently monitor board minutes or include periodic board meeting observations as part of its regular reviews unless a school is in breach status, meaning there is often no opportunity to assess whether this information is being appropriately communicated with the entire board and school community or the board's overall level of understanding of the information communicated. While NACSA supports differentiated oversight, periodic governance 'spot checks,' even for schools in good standing, may help SCPCSD identify issues while also increasing board engagement and promoting transparency of communications.

Other options for engaging school board members include requiring one or more board members to be present for

critical portions of site visits to hear feedback in person. Additionally, in cases in which closure is possible, the SCPCSD may consider having schools' boards called to meet with the district board. The latter has the benefit of building the awareness of both boards and providing an opportunity to further the alignment of SCPCSD board members and staff.

Adopting a long-term board engagement strategy involves investment of staff time and resources but pays dividends during high-stakes renewal decisions and, in some cases, may encourage school boards to make closure decisions themselves, allowing for less contentious and more positive transitions for impacted students.

LOOKING FORWARD – SUMMARY OF RECOMMENDATIONS

SHORT-TERM RECOMMENDATIONS

RECOMMENDATION	GOAL
1.1: Review allocation of internal capacity and staffing to ensure that the district performs all core authorizing functions at the highest levels, in alignment with its clear strategic direction and commitment.	Sustain, build on, and prioritize improvements to core authorizing functions.
2.1: Ensure that substantive authority for new school recommendations rests with district leadership, not external reviewers; assign the lead evaluator role to a SCPCSD staff member.	Strengthen district ownership of application recommendations and promote increased staff/board alignment on new charter decisions.
3.1: Ensure communications to school leaders and school boards are clear and comprehensive regarding the content and application of the Core Performance System and School Performance Framework.	Minimize confusion and maximize “no surprises” environment amongst the district’s portfolio of schools.
3.2.: Improve communication around intervention notices and standing.	Strengthen clarity of expectations and status.
4.1: Leverage upcoming renewals as an opportunity to build early communication strategies and strengthen the portfolio.	Ensure smooth renewal process and schools’ understanding of their status.

LONG-TERM RECOMMENDATIONS

RECOMMENDATION	GOAL
1.2.: Develop a strategic plan for leveraging the district’s cash reserves to advance key priorities.	Ensure strategic use of resources.
2.2: Establish a proactive support and review structure to maximize the potential for yielding the highest-quality charter applications while maintaining applicant autonomy and independence from the district.	Increase the number of high-quality charter applicants.
3.3: Develop a site visit strategy and a corresponding site visit protocol that includes guidance for the individuals conducting the site visit and standard procedures for communicating with schools to ensure they understand the purpose and focus of the visit, and receive timely feedback post the visit.	Build relationships; promote internal and external clarity regarding the purpose and scope of site visits.

4.2: Build relationships and develop long-term communication strategies with schools' boards.

Promote board ownership of school outcomes; facilitate high-stakes renewal decision-making.

HELPFUL RESOURCES AND PROGRAMS

Based on the recommendations above, below is a list of authorizers and peer resources that may be helpful to explore:

- Recommendation 1.2. If interested in exploring a revolving charter school loan fund managed by an authorizer, reach out to the Nevada Public Charter School Authority, which maintains one: http://charterschools.nv.gov/ForSchools/For_Schools/. Similar programs are more commonly found at the state level and often involve public-private partnerships.
- Recommendation 2.2. If interested in exploring a multi-stage application review process with formal applicant feedback mechanisms, reach out to Orleans Parish School Board, <https://opsb.us/schools/open-a-school/>, or the process developed by the Massachusetts Department of Elementary and Secondary Education, <http://www.doe.mass.edu/charter/new/?section=app>.
- Recommendation 4.1. If interested in exploring the development of an interim review process for all schools at a defined point, such as 3 to 5 years prior to renewal, reach out to Shelby County Schools, which developed a process last year.
- For any new staff or board members who may benefit from onboarding to quality authorizing practices, consider NACSA's Virtual Authorizer Bootcamp.

BIOGRAPHIES

Cliff Chuang currently serves as Senior Associate Commissioner for Educational Options at the Massachusetts Department of Elementary and Secondary Education. He is responsible for supporting and overseeing the wide range of educational options available to Massachusetts families, including charter, virtual, and other redesigned school models; career technical education; adult basic education; and out-of-school time programs. He also oversees the Department's student and family support initiatives, and the state's problem resolution system to ensure educational equity. He serves on the board of the National Center for Special Education in Charter Schools and NACSA's national advisory board. Cliff previously served as the director of charter schools for the New York State Education Department. He started his career teaching secondary mathematics and science in Boston, in both district and charter school settings. He holds an A.B. in mathematics from Harvard University and an M.Ed. in Secondary Mathematics Teaching from Boston College.

Molly McGraw Healy serves as the Director of Charter School Authorizing for the University of St. Thomas in St. Paul, Minnesota, providing oversight to a mid-sized portfolio of charter schools in conjunction with St. Thomas' Charter Accountability Board. Molly earned her B.A. in English Literature and Education at St. Olaf College. In 2010, she earned her M.P.P., with an emphasis on education and charter school policy, from the Hubert H. Humphrey Institute of Public Affairs. Formerly, Molly was the senior manager of the charter school program at Volunteers of America and has also worked as an education policy researcher for the Minnesota House of Representatives' Research Department.

SOURCES

South Carolina Charter School Law
Strategic Planning Documents
Board Policies
Budget Documents
Organizational Charts

Application Packet, Criteria, and Supplementary Documents
Pre-Application Materials and Training Sessions
Capacity Interview Materials
Sample Application and Application Evaluations
Pre-Opening Conditions

Charter School Contract and Sample Contracts
Core Performance System and Performance Frameworks
Intervention Ladder and Sample Notices
Site Visit Materials
Annual Reports

Renewal Applications
Renewal Process
Expansion Application and Process
Revocation Notices

Interviews with Staff, Board Members, and School Leaders
School Leader Survey